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WESTERN DISTRICT OF LOUISIANA

2:06CV2235

JUDGE TRIMBLE

MAGISTRATE JUDGE WILSON

14TH JUDICIAL DISTRICT COURT FOR THE PARISH OF CALCASIEU

NO. 2006-004163 STATE OF LOUISIANA

DIVISION D

JONATHAN RUFFIN AND VERA RUFFIN

VERSUS

GENERAL INSURANCE COMPANY OF AMERICA

FILED: SEP 11 2006

5/ Nodica G. Foreman
DEPUTY CLERK

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, come plaintiffs, Jonathan Ruffin and Vera Ruffin, major residents of and domiciled in the Parish of Calcasieu, State of Louisiana, who with respect, represents that:

1.

Made defendant herein is: General Insurance Company of America, a foreign insurance carrier authorized to do and doing business within the State of Louisiana, and whose registered agent for service of process is: The Louisiana Secretary of State, Baton Rouge, Louisiana. Service is requested at this time.

2.

Plaintiffs owned a home located at 305 Deshotel, Lake Charles, Louisiana.

3.

As a result of Hurricane Rita, plaintiffs' home sustained damages.

4.

As a result of the damage to plaintiffs' home, they lost the use of their home.

5.

Pursuant plaintiffs' policy with General Insurance Company of America, plaintiffs made demand on defendant, General Insurance Company of America, for payment for repairs to the home.

6.

Defendant, General Insurance Company of America, failed to fully pay plaintiffs for repairs to the home.

7.

Plaintiffs are entitled to recover from defendant, General Insurance Company of America, damages equivalent to the cost of all repairs to their home.

8.

Pursuant to plaintiffs' insurance policy with General Insurance Company of America, plaintiffs made demand on defendant, Safeco Property and Casualty Insurance Company, for payment for loss of use of their home.

9.

Defendant, General Insurance Company of America, failed to fully pay plaintiffs for the loss of use of their home.

10.

Plaintiffs are entitled to recover from defendant, General Insurance Company of America, damages for the loss of use of their home.

11.

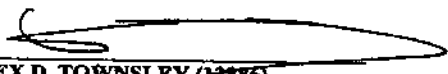
Defendant, General Insurance Company of America's, failure to pay for the property damage to and the loss of use of the plaintiffs' home was in bad faith, in violation of LSA-R.S. 22:658, LSA-R.S. 22:1220 and/or LSA-C.C. art. 1997, entitling plaintiffs to penalties, attorney's fees and general and special damages.

WHEREFORE, plaintiffs, Jonathan Ruffin and Verna Ruffin, pray that defendant, General Insurance Company of America, be duly cited and served with a copy of this Petition for Damages and be required to appear and answer the same within the delays allowed by law; and, that after all due proceedings have been had, that there be judgment rendered herein in favor of plaintiffs and against defendant, in an amount of damages as shown by the evidence that is just and reasonable, together with penalties, attorney fees, general and special damages, legal interest

thereon from date of judicial demand until paid and all costs of these proceedings. The plaintiffs further pray for all orders and decrees necessary in the premises and for such other and further relief as equity and the justice of the cause may require and permit.

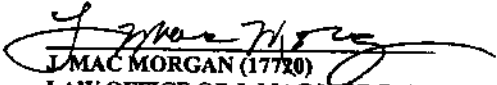
Respectfully submitted:

THE TOWNSLEY LAW FIRM, L.L.P.



REX D. TOWNSLEY (22886)
3102 Enterprise Boulevard
Lake Charles, Louisiana 70601
Telephone: (337) 478-1400
Facsimile: (337) 478-1577

and



J. MAC MORGAN (17720)
LAW OFFICE OF J. MAC MORGAN
4650 Nelson Road
Suite 415
Lake Charles, Louisiana 70605
Telephone: (337) 474-7143
Facsimile: (337) 479-8017

ATTORNEYS FOR PLAINTIFF

PLEASE SERVE:

General Insurance Company of America,
through its registered agent for service of process:
The Louisiana Secretary of State
Baton Rouge, Louisiana

A TRUE COPY
LAKE CHARLES, LOUISIANA
9/12/06



Melba J. Loutin
DEPUTY CLERK OF COURT
CALCASIEU PARISH, LOUISIANA